



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK:KTF
F. #2016R01805

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 2, 2019

By ECF & Email

Joseph W. Ryan, Jr., Esq.
Melville Law Center
225 Old Country Road
Melville, New York 11747-3111

Re: United States v. Michael Watts
Criminal Docket No. 17-372 (S-2) (JS)

Dear Mr. Ryan:

The government provides herein the identity of an additional witness, Victoria Cruickshank, who it may call in its case-in-chief at the upcoming trial of this matter. The government has already provided materials, pursuant to Title 18, United States Code, Section 3500, with regard to this witness on September 20, 2019 (ECF No. 532). The government reserves the right to amend or supplement its witness list and 3500 disclosures.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Whitman G.S. Knapp
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c.c.: Clerk of the Court (JS) (by ECF)